

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-21

SAMY MOHAMMED HAMZEH,

Defendant.

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**GOVERNMENT'S MOTION TO EXTEND RESPONSE TIME**

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The United States of America, by United States Attorney Gregory J. Haanstad and Assistant United States Attorney Paul L. Kanter, moves the Court for an extension of time within which to respond to the defendant's Motion for Release of Brady Materials.

On January 3, 2018, the defendant filed a motion asking the Court to order the government to disclose a long list of materials. The government's position has been, and continues to be, that it has complied with its disclosure obligations under *Brady*. Nonetheless, the government has now agreed to disclose some of the additional material sought by the defendant. This additional disclosure is based not on any conclusion by the government that the material is exculpatory, but rather will be made as part of an effort to narrow the disclosure issues that will ultimately require a decision by the Court.

The government is seeking an additional seven days within which to respond to the defendant's *Brady* motion. The additional time will allow the government to accurately

apprise the Court of what defense requests remain in dispute in light of the additional government disclosures.

The government has conferred with Attorney Craig W. Albee, who indicated that he has no objection to this request.

Dated the 12<sup>th</sup> day of January, 2018.

Respectfully submitted,

s/ Gregory J. Haanstad  
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